

UNITED STATES DISTRICT COURT  
FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA,	§	
Plaintiff,	§	
	§	
v.	§	CIVIL ACTION NO.
	§	
\$18,977.00 IN U.S. CURRENCY,	§	
Defendant in rem	§	

**VERIFIED COMPLAINT FOR FORFEITURE IN REM**

United States of America, Plaintiff, files this action for forfeiture against approximately \$18,977.00 in United States currency, Defendant in rem, and alleges the following.

*Nature of the Action*

1. This is an action to forfeit property to the United States pursuant to 31 U.S.C. §5317(c)(2).

*Defendant in Rem*

2. Defendant in rem is approximately \$18,977.00 in United States currency that was seized from Charles Taliaferro on June 21, 2011, at the George Bush Intercontinental Airport in Houston, Texas.

*Jurisdiction and Venue*

3. This Court has jurisdiction under 28 U.S.C. §1355 because this is an action for forfeiture.

4. Venue is proper in this Court under 28 U.S.C. §§ 1355 and 1395(a) and (b) because:

- a. the acts or omissions giving rise to the forfeiture occurred in the Southern District of Texas;
- b. the property was found in the Southern District of Texas; and
- c. this forfeiture action accrued in the Southern District of Texas.

*Basis for Forfeiture*

5. The Defendant in rem is subject to forfeiture pursuant to 31 U.S.C. § 5317(c)(2) which provides that any property involved in violations of 31 U.S.C. §§ 5316 and 5324(c) may be forfeited to the United States. These statutes state in pertinent part that:

- 1) a person shall file a report when the person knowingly transports, is about to transport, or has transported a monetary instrument of more than \$10,000 out of the United States. 31 U.S.C. § 5316(a)(1)(A);
- 2) no person shall, for the purpose of evading the reporting requirements of 31 U.S.C. § 5316, fail to file a report required by 31 U.S.C. § 5316. 31 U.S.C. § 5324(c)(1);
- 3) no person shall, for the purpose of evading the reporting requirements of 31 U.S.C. § 5316, file a report required by 31 U.S.C. § 5316 that contains a material omission or misstatement of fact. 31

U.S.C. § 5324(c)(2).

*Facts*

6. On June 21, 2011, Charles Taliaferro was about to leave the United States aboard Continental flight #1628 to Belize City, Belize at the George Bush Intercontinental Airport in Houston, Texas. In the jetway for this flight, a United States Customs and Border Protection Officer (CBP Officer) conducted a Customs outbound inspection. The CBP Officer explained to Charles Taliaferro the monetary reporting requirement for passengers leaving the United States. He asked Mr. Taliaferro if he was transporting more than \$10,000 in cash or monetary instruments for himself or others. Mr. Taliaferro stated that he was transporting only \$9,000, and he confirmed this in writing.

7. A CBP Officer directed Mr. Taliaferro to an inspection table to verify the amount of money he was carrying. At the inspection table, a CBP Officer asked Mr. Taliaferro place his money on the table. Mr. Taliaferro placed some money on the table, but a CBP Officer found additional money in Mr. Taliaferro's briefcase. In total, CBP Officers discovered that Mr. Taliaferro was carrying \$18,977. CBP Officers seized these funds for forfeiture. After this seizure, Mr. Taliaferro told a Special Agent that he thought that "it was not a big deal to report it all."

*Relief Requested*

8. Plaintiff requests an arrest warrant and summons pursuant to Rule G, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, a judgment of forfeiture, and costs and other relief to which the Plaintiff may be entitled.

Dated: August 17, 2011.

Respectfully submitted,

José Angel Moreno  
United States Attorney

By: /s/ Albert Ratliff  
Albert Ratliff  
Attorney-in-Charge  
NY Bar No. 1073907  
SDTX Bar No. 6764  
Assistant United States Attorney  
United States Attorney's Office  
P. O. Box 61129  
Houston, Texas 77208  
E-mail: [albert.ratliff@usdoj.gov](mailto:albert.ratliff@usdoj.gov)  
Office: (713) 567-9579  
Fax: (713) 718-3300

*Verification*

I, Michael Campise, Special Agent, United States Homeland Security Investigations, declare under penalty of perjury as provided by 28 U.S.C. §1746 that I have read this Verified Complaint for Forfeiture in Rem, and the facts stated

in this complaint are true and correct to the best of my knowledge and belief.

Executed on August 17, 2011.



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Michael Campise, Special Agent  
U. S. Homeland Security Investigations